

**AHMAD KESHAVARZ**

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March 31, 2023

VIA ECF

Magistrate Judge Lois Bloom  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Joint status letter.**

***Remler v. Cona Elder Law PLLC, et al., No. 1:21-cv-05176-ARR-LB***

Dear Judge Bloom:

The undersigned represents Plaintiff Jane Remler in this FDCPA lawsuit against the nursing home debt collection law firm Cona Elder Law, PLLC, f/k/a Genser, Dubow, Genser & Cona, LLP (“Cona”).

On March 29, 2023, the parties filed a stipulation for Plaintiff to file her Second Amended Complaint by April 14, 2023 rather than the prior deadline of March 31, 2023. *See* Dkt. No. 28. This stipulation was entered into because the earliest possible deposition date for a key witness, an employee of the Defendant, was not available until April 6, 2023. Plaintiff believes she will be amending the complaint based in part upon this testimony.

Sincerely,

/s/

Ahmad Keshavarz

cc: all counsel of record via ECF